

Date: 12-31-92

To:

J. Rancourt

A. MacKenzie

D. Sundberg

J. Peterson

L. Hernandez

From:

Bob Berman

Subject: Sample Compliance Committee

Attached are the minutes of our December 6, 1992 meeting. If there are any corrections or additions please let me know.

TAP00063297

DEFENDANT'S

SAMPLES COMPLIANCE COMMITTEE MINUTES OF 12/6/92

The Samples Compliance Committee (SCC) meet on Wednesday, December 16, 1992. The following people were in attendance:

John Rancourt
Alan MacKenzie
Dean Sundberg
Jeff Peterson
Bob Berman
Lori Hernandez

Committee Charter

The purpose of the committee was stated as

- A. Review changes/exceptions to policy to insure the integrity of the system to detect diversions is preserved.
- B. Review specific Representatives performance in three classes to insure sample product is not being diverted.

Policy/Change Review

TAP00063298

1. Sample Card

A new design of a samples signature card was reviewed. The design was approved with one change. An area to show a referring primary care physician was removed.

2. Inventory Audit by District Managers

Current Procedures call for the District Managers to confirm the Sales Representatives Month End Inventory. about every six months. The methods for auditing inventory was deemed somewhat difficult to accomplish. It was decided that the District managers would perform the audit in the middle of a month. A new form would be developed to show the prior month end inventory, plus an subsequent deliveries and samples. This audit would be done for each Representative sampling at least once per year. A copy of the new form is attached.

Representative Review

 The list of Sales Representatives with multiple adjustments was reviewed. This list shows every Representative that has used adjustments in three or more of the last six months.

It was suggested that the listing be expanded to show the actual adjustments made and the reason they were made as well as the current position of each Rep involved. This will be included for the next meeting.

All individuals on the list were reviewed and found to be in compliance with Federal regulations.

2. The list of Sales Representatives with a high samples per Physician average was reviewed. This list shows by product anyone whose average samples per physician is at least double their District average.

The listing will be presented for each month. Any high Lupron samples for a single physician will be analyzed according to that physician's buying pattern. An update to show that buying pattern for September is attached.

All individuals on the list were reviewed and, pending a review of the buying patterns for specific individuals, found to be in compliance with Federal regulations.

3. The list of special situation items was reviewed. This list shows any Representative who may not be covered by the two categories above but who, in the opinion of the Samples Review Administrator and the Manager of Sales Administration should be reviewed.

It was suggested that this list be expanded to show two additional items.

- a. Add to the list those items that special situations that were resolved since the last meeting. The example used was for Tracy Neal. Tracy had extensive problems in balancing. The situation could not be resolve over the telephone so Tracy was asked to bring all her documents to our office. During the day she was here, all her products were balanced and she sat through the training class again to reinforce the concepts of the programs.
- b. The report should add columns to state the problem, action taken and current situation.

All individuals on the list were reviewed and found to be in compliance with Federal regulations.

TAP PHARMACEUTICALS INVENTORY AUDIT FORM

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Previous Month-End Inve	ntory ,	Date:	-	
ar	Quantity per Month-End Inventory	Deliveries since last Month-End Inventory	Sales since last Month-End Inventory	Current Inventory
Lupron				
3.75mg Depot Kit		·		
7.5mg Depot Kits		•	-	=
Ogen				
.625 6x25 Tabs			-	•
1.25 6x25 Tabs		·		= 1
1 Tube x 14g Cream				=
lytrin				
5 x 21 Tabs				=
			TAP0006	3300
			5.5	
Certify that the above pl stored in proper condition		es are correct and that a	all samples are being	
Representative Signature:				DATE
District Manager's Signatur	·e:			
				DATE